

EXHIBIT 156

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Mark Mitsui, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I am the current President of the Portland Community College (“PCC”) in Portland, Oregon. I began my tenure as PCC President in August 2016.

3. Before joining PCC, I served as Deputy Assistant Secretary for Community Colleges within the Office of Career, Technical and Adult Education for the U.S. Department of Education from 2013 to 2016.

4. PCC has a commitment to equitable student success, which includes a commitment to educational access for Deferred Action for Childhood Arrivals (“DACA”) recipients – also known as “Dreamers.”

5. PCC provides affordable tuition for all Oregonians, and scholarships to some DACA recipients. These scholarships assist in satisfying PCC’s educational mission and prepare Oregon residents for the workforce.

6. I have confirmed that many DACA recipients are students who attend PCC in Portland, Oregon.

7. Rescinding DACA will harm the ability of PCC to satisfy its educational mission and prepare Oregon residents for the workforce.

8. Rescinding DACA will likely cause some DACA recipients to leave Oregon and PCC. Future DACA students will be prevented from enrolling, either due to deportation or fear of deportation. These harms will damage the educational mission of PCC and affect its tuition revenues.

9. I have confirmed that PCC employs DACA recipients to work in on-campus positions, such as frontline staff.

10. Rescinding DACA will hurt PCC’s on-campus hiring and, as a result, the Oregon economy. Stripping DACA recipients of the ability to work legally will cause PCC students to

lose their student jobs, resulting, among other things, in less tax revenue for the state. It will also result in these students being unable to pay tuition and gain on-the-job experience. The end result will be that DACA recipients will be uneducated and untrained to enter highly skilled jobs, also resulting in less tax revenue for the state.

11. Employers in the Portland metro-area are calling on PCC to train their workers and bridge their skills gap. Without DACA, PCC will likely see a decline in enrollment. Without DACA, PCC will find it more challenging to meet the number of skilled workers needed in this region.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 7th day of September, 2017, at Portland, Oregon.



MARK MITSUI, PCC PRESIDENT